

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

May 25, 2017

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees, on behalf of plaintiffs, along with the Defendants' Executive Committee, on behalf of defendants currently engaged in jurisdictional and merits discovery, jointly write to request a three-week extension of the deadline for submission of the proposed comprehensive deposition protocol, and parties' letters explaining their position with respect to areas of disagreement concerning the protocol. Pursuant to the Court's May 1, 2017 Order (ECF No. 3541), those submissions presently are due on May 29, 2017. The parties jointly request that the deadline be extended to June 19, 2017.

By way of background, representatives of the Plaintiffs' Executive Committees and Defendants' Executive Committee conferred concerning the logistics of drafting and negotiating the comprehensive deposition protocol on May 1, 2017. During that call, the parties agreed that the Defendants' Executive Committee would prepare an initial draft of the protocol for plaintiffs' consideration. The Defendants' Executive Committee has indicated that it will circulate that draft later today.

To allow sufficient time for the Plaintiffs' Executive Committees to review the initial draft and to meet-and-confer with the Defendants' Executive Committee, the parties jointly request that the deadlines set in the Court's May 1, 2017 Order, be extended to June 19, 2017.

The Honorable Sarah Netburn

May 25, 2017

Page 2

The parties thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Sean P. Carter", with a stylized flourish extending to the right.

By: Sean P. Carter

SPC/:bdw

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)

LEGAL\30716693\1